

EXHIBIT 22

B-Complaint CAP Cover Page

Kalamazoo Public Schools (39010) - July 2018

The RAP Team, as listed below has created the Corrective Action Plan and will assure that all responsible parties complete the tasks and activities and provide evidence of correction.

Name	Position	Date
Reuquiyah Saunders	Director of Special Education	8/23/2018
Nkenge Bergan	Director of Student Services	8/23/2018
Barry Smith	Administrator of Student Services	8/23/2018
Janine VanStee	Coordinator of Special Education	8/23/2018
Johnny Edwards	Secondary Director of Education	8/23/2018
Kevin Seale	School Psychologist	8/23/2018

Required Compliance and Sanctions

Each activity in the Corrective Action Plan (CAP) is subject to and must be carried out in compliance with the procedural requirements of the IDEA and corresponding implementing federal regulations and state rules . In no event may the district leave its obligations toward these findings of noncompliance unresolved.

This CAP will remain open pending OSE and/or OGS/ECD&FE verification that the noncompliance has been corrected within the required timeline. The district is advised that the OSE and/or OGS/ECD&FE will maintain jurisdiction over the findings of noncompliance until the CAP is officially closed . Failure to correct the areas of noncompliance will result in enforcement actions by the State.

MDE CAP Clarification/Approval Comments**District CAP Clarification****MDE Verification/Closeout Comments****ISD Verification Clarification**

Kalamazoo Public Schools (39010) - July 2018

Case Number: 18-0085

Complaint Findings:

The district is not in compliance with the IDEA and/or the MARSE regarding child find including:

The District had information to suspect that the Student may be a student with a disability and in need of special education and did not meet their child find obligation.

1. Based on your RAP Team activities, what are the underlying problems that caused the noncompliance? How may district policies, procedures and practices, or the lack of supports, have contributed to these results?

The underlying problems that caused the noncompliance was the lack of documentation from the district in this case regarding Child Find attempts over the student elementary and middle school years. The district failed to create and appropriate documentation to show building team attempts to provides appropriate supports including an initial evaluation to the family, but family refused. In addition, the district's understanding and MDE's interpretation of exclusionary factors for eligibility, in this case chronic absenteeism. IDEA and MARSE identify attendance as a possible exclusionary factor and this student has had a chronic attendance issue for the past 3 years. However, in the this complaint finding, the district was informed that this should not have been a factor in considering is the student had a disability. The district will update policies and procedures in accordance with MDE's interpretation of IDEA and MARSE regarding Child Find based on this case.

2. Required Corrective Action:

The district must revise or develop procedures regarding child find, as needed, by 09/01/2018 to document and ensure that:

- The District fulfills its ongoing Child Find obligation to identify, locate and evaluate students who are suspected of having a disability and in need of special education services.

The district must provide professional development by 01/15/2019 for all relevant staff regarding the new procedures. Evidence of change in the district's practices must be provided and verified by the OSE.

3. Activity steps, dates they will occur, and name/title of person responsible:

	<u>Activity Steps</u>	<u>Date/Deadline(s)</u>	<u>Name/Title of Person Responsible</u>
1	The district will provide all SE ancillary staff with professional development in the findings of this case, MDE's interpretation of Child Find and compliance corrective actions required by the district.	10/26/2018	Director of Special Education
	The district will provide MTSS and child study teams with professional development implementing MDE's interpretation from the case regarding Child Find and the updated district procedures based on this case and the corrective action required.	11/2/2018	Director of Special Education

4. What documentation will your district have available as evidence that your tasks and activities were completed (e.g., meeting notes, agendas, new procedures)?

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The district will provide professional development slides, agenda, and sign-in sheets of the two activities identified above that will detail MDE's findings in this case, their recommendations and corrective level action requirements regarding Child Find.

5. How will the district monitor data on a monthly basis to determine that the tasks and activities listed in #3 have corrected the noncompliance (e.g., monthly data pulls, monthly record reviews)?

The district will review initial request and REED consent documents to ensure that all the MDE's Child Find interpretations are represented in the documentation as well as in the Student Services department manual.

If an assurance statement is required, please upload it here:

MDE Findings Comments

District Findings Clarification